

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
V.	:	DATE FILED: _____
LYNWOOD LANIER	:	VIOLATIONS: 18 U.S.C. §2113(a) (bank robbery - 9 counts) Notice of Additional Factors

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about December 23, 2003, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

LYNWOOD LANIER

knowingly and unlawfully by force and violence, and by intimidation, did take from an employee of
Citizen's Bank, located at 1735 Market Street, Philadelphia, Pennsylvania, lawful currency of the
United States, that is approximately \$ 1,140.00 belonging to, and in the care, custody, control,
management and possession of Citizen's Bank, the deposits of which were and are insured by the
Federal Deposit Insurance Corporation, Certificate Number 57282.

In violation of Title 18, United States Code, Section 2113(a).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 8, 2004, Philadelphia, in the Eastern District of Pennsylvania, defendant

LYNWOOD LANIER

knowingly and unlawfully by force and violence, and by intimidation, did take from an employee of Commerce Bank, located at 121 South Broad Street, Philadelphia, Pennsylvania, lawful currency of the United States, that is approximately \$ 2,318.00 belonging to, and in the care, custody, control, management and possession of Commerce Bank, the deposits of which were and are insured by the Federal Deposit Insurance Corporation, Certificate Number 25293-0.

In violation of Title 18, United States Code, Section 2113(a).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 15, 2004, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

LYNWOOD LANIER

knowingly and unlawfully by force and violence, and by intimidation, did take from an employee of Commerce Bank, located at 3735 Walnut Street, Philadelphia, Pennsylvania, lawful currency of the United States, that is approximately \$ 10,100.20 belonging to, and in the care, custody, control, management and possession of Commerce Bank, the deposits of which were and are insured by the Federal Deposit Insurance Corporation, Certificate Number 25293-0.

In violation of Title 18, United States Code, Section 2113(a).

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 29, 2004, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

LYNWOOD LANIER

knowingly and unlawfully by force and violence, and by intimidation, did take from an employee of
Commerce Bank, located at 2520 Grant Avenue, Philadelphia, Pennsylvania, lawful currency of the
United States, that is approximately \$ 5,342.00 belonging to, and in the care, custody, control,
management and possession of Commerce Bank, the deposits of which were and are insured by the
Federal Deposit Insurance Corporation, Certificate Number 25293-0.

In violation of Title 18, United States Code, Section 2113(a).

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 4, 2004, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

LYNWOOD LANIER

knowingly and unlawfully by force and violence, and by intimidation, did take from an employee of
Commerce Bank, located at 3930 Woodhaven Road, Philadelphia, Pennsylvania, lawful currency of the
United States, that is approximately \$ 2,693.00 belonging to, and in the care, custody, control,
management and possession of Commerce Bank, the deposits of which were and are insured by the
Federal Deposit Insurance Corporation, Certificate Number 25293-0.

In violation of Title 18, United States Code, Section 2113(a).

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 12, 2004, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

LYNWOOD LANIER

knowingly and unlawfully by force and violence, and by intimidation, did take from an employee of the Sun East Federal Credit Union, located at 9212 Frankford Avenue, Philadelphia, Pennsylvania, lawful currency of the United States, that is approximately \$ 1,926.00 belonging to, and in the care, custody, control, management and possession of the Sun East Federal Credit Union, the deposits of which were and are insured by the National Credit Union Share Insurance Fund, Certificate Number 06160.

In violation of Title 18, United States Code, Section 2113(a).

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 14, 2004, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

LYNWOOD LANIER

knowingly and unlawfully by force and violence, and by intimidation, did take from an employee of
Citizen's Bank, located at 9218 Frankford Avenue, Philadelphia, Pennsylvania, lawful currency of the
United States, that is approximately \$ 3,279.00 belonging to, and in the care, custody, control,
management and possession of Citizen's Bank, the deposits of which were and are insured by the
Federal Deposit Insurance Corporation, Certificate Number 57282.

In violation of Title 18, United States Code, Section 2113(a).

COUNT EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 19, 2004, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

LYNWOOD LANIER

knowingly and unlawfully by force and violence, and by intimidation, did take from an employee of
Citizen's Bank, located at 7237 Frankford Avenue, Philadelphia, Pennsylvania, lawful currency of the
United States, that is approximately \$ 1,547.00 belonging to, and in the care, custody, control,
management and possession of Citizen's Bank, the deposits of which were and are insured by the
Federal Deposit Insurance Corporation, Certificate Number 57282.

In violation of Title 18, United States Code, Section 2113(a).

COUNT NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 22, 2004, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

LYNWOOD LANIER

knowingly and unlawfully by force and violence, and by intimidation, did take from an employee of Commerce Bank, located at 8310 Henry Avenue, Philadelphia, Pennsylvania, lawful currency of the United States, that is approximately \$ 3,508.95 belonging to, and in the care, custody, control, management and possession of Commerce Bank, the deposits of which were and are insured by the Federal Deposit Insurance Corporation, Certificate Number 25293-0.

In violation of Title 18, United States Code, Section 2113(a).

NOTICE OF ADDITIONAL FACTORS

THE GRAND JURY FURTHER CHARGES THAT:

1. In committing the offense charged in Counts One through Nine of this indictment, defendant LYNWOOD LANIER:
 - a. Committed an offense in which the property of a financial institution or post office was taken, and in which the taking of such property was an object of the offense, as described in U.S.S.G. § 2B3.1(b)(1).
2. Committed an offense in counts 1 through 7 in which a threat of death was made, as described in U.S.S.G. § 2B3.1(b)(2)(F).
3. Committed an offense in count 2 involving a loss exceeding \$ 10,000, as described in U.S.S.G. § 2B3.1(b)(7).

A TRUE BILL:

GRAND JURY FOREPERSON

PATRICK L. MEEHAN
United States Attorney